NICHOLAS A. TRUTANICH 1 United States Attorney District of Nevada 2 Chantal R. Jenkins 3 Special Assistant United States Attorney Social Security Administration 160 Spear Street, Suite 800 San Francisco, CA 94105 5 Telephone: (415) 977-8931 Facsimile: (415) 744-0134 Email: chantal.jenkins@ssa.gov 7 Attorneys for Defendant 8 9 10 UNITED STATES DISTRICT COURT 11 DISTRICT OF NEVADA 12 PAUL N. MISKEY, 13 Case No.: 2:19-cv-00027-JCM-VCF Plaintiff. 14 MOTION FOR EXTENSION OF TIME v. (DEFENDANT'S SECOND REQUEST) 15 ANDREW SAUL. Commissioner of Social Security, 16 17 Defendant. 18 19 Defendant, Andrew Saul, Commissioner of Social Security ("Defendant") respectfully requests 20 that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or 21 Remand by twenty-one days from August 9, 2019 to August 30, 2019. Defendant's counsel requests 22 additional time because she is in the process of conferring with her client and in settlement discussions 23 with Plaintiff's counsel to determine if this matter can be resolved. The additional requested time 24 would also allow counsel to complete a response to the pending motion for summary judgment if this 25

matter cannot be resolved. Defendant's counsel will endeavor to complete these tasks as soon as

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1	possible.
2	This request is made in good faith with no intention to unduly delay the proceedings.
3	Counsel apologizes to the Court for any inconvenience caused by this delay.
4	Counsel for Defendant spoke with Plaintiff's counsel via telephone and counsel does not object
5	to the extension.
6	Respectfully submitted this 8th day of August 2019.
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8	NICHOLAS A. TRUTANICH United States Attorney
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10	/s/ Chantal R. Jenkins
11	CHANTAL R. JENKINS
12 13	Special Assistant United States Attorney
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17	IT IS SO ORDERED:
18	Contacto
19	UNITED STATES MAGISTRATE JUDGE
20	8-23-2019
21	DATED:
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CERTIFICATE OF SERVICE I, Chantal R. Jenkins, certify that the following individual was served with a copy of the MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below: CM/ECF: Richard E. Donaldson Richard E. Donaldson, Esq., Chtd. 2300 West Sahara Avenue Suite 800 Las Vegas, NV 89102 Dated this 8th day of August 2019. /s/ Chantal R. Jenkins CHANTAL R. JENKINS Special Assistant United States Attorney